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KIMBERLY SEIFERT AND AMBER SEIFERT

6 **UNITED STATES DISTRICT COURT**  
7 **DISTRICT OF NEVADA**

8 PARIS REGAN, MARK REGAN, and PAMELA  
9 REGAN,

Case No.: 13:16-CV-00508 MMD VPC

10 Plaintiffs,

11 vs.

12 CARSON CITY SCHOOL DISTRICT, a  
Political Subdivision of the State of Nevada;  
13 RICHARD STOKES, TASHA FUSON, MARK  
RODINA, SHEILA STORY, MIKAYLA  
STORY, SHARI STOCK, MADISON STOCK,  
14 R.S., KIMBERLY SEIFERT, AMBER  
SEIFERT, K.C., HALLE CARL, DONNA  
CARL, and DOES 1-50, and DOE ENTITIES 1-  
50,

17 Defendants.

18 **STIPULATION FOR ORDER OF DISMISSAL WITH PREJUDICE,  
19 AND DETERMINATION OF GOOD FAITH SETTLEMENT**

20 **IT IS HEREBY STIPULATED AND AGREED**, by and between all Parties, by and through their  
undersigned counsel of record, that the above entitled matter shall be dismissed, with prejudice, in its  
entirety, with each party to bear their own costs and fees incurred herein.

21 **IT IS FURTHER HEREBY STIPULATED AND AGREED**, by and between all Parties, by and  
through their undersigned counsel of record, that each and every settlement by the Parties is a fair and  
reasonable amount pursuant to NRS 17.245, and in so doing, the Parties agree that 1) the settlement  
amount as to each party is appropriate and approved; 2) that the allocation among the Parties is fair and  
reasonable; 3) that the applicable factors outlined in *The Doctors Co. v. Vincent*, 120 Nev. 644, 98 P.3d

1 681 (2004) have been satisfied; and 4) that there is no collusion, fraud, or tortious conduct aimed to  
2 injure the interests of any possible parties. The parties further agree that any additional claims or cross  
3 claims against any party to this action pertaining to the matters set forth in Plaintiffs' Complaint are  
4 barred.

5 **RESPECTFULLY SUBMITTED** this 9<sup>th</sup> day of February, 2017.  
6

7 /s/ Day R. Williams

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1                   **CERTIFICATE OF ELECTRONIC SERVICE; FRCP 5 (b)**

Pursuant to FRCP 5(b), I hereby certify that I am an employee of Lemons, Grundy & Eisenberg, and that on February 9, 2017, I electronically filed the foregoing **STIPULATION FOR ORDER OF DISMISSAL WITH PREJUDICE, AND DETERMINATION OF GOOD FAITH SETTLEMENT**, through the CM/ECF program, and the court will send notice to the following through the CM/ECF program:

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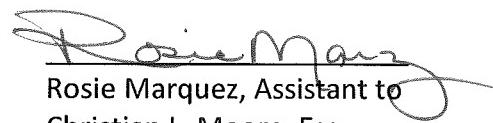
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1                           **ORDER OF DISMISSAL WITH PREJUDICE,**  
2                           **AND DETERMINATION OF GOOD FAITH SETTLEMENT**

3                           The parties hereto having stipulated to the dismissal of the above captioned matter with prejudice,  
4                           with each party paying their own costs and fees, and each settlement by every party is in good good-faith  
5                           pursuant to NRS 17.245, and good cause appearing therefore,

6                           IT IS HEREBY ORDERED that this matter be, and it hereby is, dismissed with prejudice, and each  
7                           and every settlement is in good faith pursuant to NRS 17.245 and the applicable factors outlined in *The*  
8                           *Doctors Co. v. Vincent*, 120 Nev. 644, 98 P.3d 681 (2004), and each party shall pay their own legal costs  
9                           and fees in this matter. Any additional claims or cross claims against any party to this action pertaining to  
10                          the matters set forth in Plaintiffs' Complaint are barred.

12  
13                           **DATED** this 10th day of February, 2017.

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16  
17                           MIRANDA M. DU  
18                           DISTRICT COURT JUDGE